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                       UNITED STATES DISTRICT COURT
           CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
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    GARRY MATTHEWS, DOMINIC ROSS ) Case No.: 22-cv-02944-FLA-PD
    HUNN, and JAMAR HEARNS
    individually and as class representatives,
                                             NOTICE REGARDING PLAINTIFFS'
                                             OPPOSITION TO DEFENDANTS' MOTION TO
                     Plaintiffs,
                                             DISMISS PLAINTIFFS' FIRST AMENDED
                                             COMPLAINT
    VS.
    CITY OF LOS ANGELES, LOS
                                             Date: December 2, 2022
    ANGELES POLICE DEPARTMENT,
                                             Time: 1:30 P.M.
                                             Ctrm: 6B-First Street Courthouse Judge:
    AND LOS ANGELES BOARD OF
                                             Hon. Fernando L. Aenlle-Rocha
    POLICE COMMISSIONERS,
                     Defendants.
                                             Action Filed: 05/03/2022
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1 **NOTICE** 2 The following cases and argument relating to concurrent causation in § 1983 as to Mr. 3 Matthews claims were omitted from Plaintiffs Opposition [ECF No.] to Defendants' Motion 4 [ECF No. 40] to Dismiss the Amended Complaint. 5 Courts "do not require a plaintiff to show that a policy or practice was the exclusive cause 6 of the constitutional deprivation" but may "consider how individual policies or practices interact 7 with one another within the larger system" to determine causation. Sanchez v. Young Ctv., 956 8 F.3d 785, 795 (5th Cir.), cert. denied, 141 S. Ct. 901 (2020) (emphasis in original); see also 9 Sommers v. City of Santa Clara, No. 17-4469, 2021 WL 326931 (N.D. Cal. Feb. 1, 2021) 10 (same). This is because a municipality's policies and established practices may be 11 constitutionally inadequate if, when viewed in combination, they have a "mutually enforcing 12 effect that produces the deprivation of a single, identifiable human need." Wilson v. Seiter, 501 13 U.S. 294, 304 (1991). 14 Respectfully submitted, /s/ William Claiborne WILLIAM CLAIBORNE D.C. Bar # 446579 Counsel for named Plaintiffs 717 D Street, NW Ste 300 Washington, DC 20004 Phone 202/824-0700 Email claibornelaw@gmail.com